

**POLITICAL ADVERTISING  
DISCLOSURE STATEMENT**

**OF**

**WOLO TV  
Columbia, SC**

**This Disclosure Statement is Effective**

**For The Period Beginning September 9, 2016 and ending November 8, 2016**

## **SECTION 1 INTRODUCTION**

We wish to thank you for your interest in purchasing political advertising on WOLO-TV. It is our desire to furnish you complete information concerning our various advertising rates and to assist you in making an informed decision concerning the purchase of advertising on our station. This Disclosure Statement has been prepared and is being provided to you for that purpose.

Should you have any questions concerning the Disclosure Statement, please let us know. We realize that the purchase of broadcast advertising time may be complex. We will be pleased to respond to your questions and to clarify, upon request, the various rate plans and policies described herein. We encourage you to inquire. All inquiries should be directed to:

Chris Bailey, Vice President and General Manager  
WOLO-TV  
5807 Shakespeare Road  
Columbia, SC 29223  
803-754-7525  
cbailey@abccolumbia.com

## **SECTION 2 EQUAL OPPORTUNITY**

The Station will afford "equal opportunity" as determined by the Federal Communications Commission ("FCC") for "uses" of the station's broadcast facility by all legally qualified candidates for the same office.

For purposes of the "equal opportunity" requirement, a "use" is defined as any nonexempt appearance by a candidate on the station's broadcast facility in which the candidate's voice or likeness is identified or identifiable. Some candidate appearances, in news, news interviews, news documentaries, and involuntarily in the ads of opposing candidates do not normally qualify as a "use" and those appearances may be exempt from the "equal opportunity" law.

## **SECTION 3 THE LOWEST UNIT RATE**

It is our policy and practice to comply with all applicable FCC requirements with respect to rates charged by our station for political advertising. Thus, within the meaning of the FCC's rules, it is our policy to extend for the "use" of the Station's broadcast facility by "legally qualified candidates" during the "lowest unit charge period"—which is the forty-five (45) day period prior to a primary election and the sixty (60) day period prior to a general election—the "lowest unit charge" that the Station extends to its most favored commercial advertisers for purchase of the same class and amount of time for the same period. And we extend for the "use" of the Station's broadcast facility by "legally

qualified” candidates *outside* the applicable 45/60 day “lowest unit charge” periods, advertising rates that are comparable to rates we charge to commercial advertisers for comparable uses.

Please note that advertising (1) which does not include an appearance by the candidate in which the candidate’s voice or likeness is identified or is identifiable; (2) which is not purchased by the candidate or the candidate’s campaign committee or authorized agent; or (3) which is otherwise exempt by law does not constitute a “use.” Such advertising, therefore, would not qualify for the “lowest unit charge.”

It should be noted that the meaning of the term “use” in connection with the “lowest unit charge” requirement differs from the definition of a “use” for purposes of the “equal opportunity” requirement. For example, please see the definition of a “use” in Section 2.

Finally, *federal* candidates must meet the requirements of the Bipartisan Campaign Finance Reform Act of 2002 (“BCRA”) to qualify for the lowest unit charge. All contracts entered into with federal candidates seeking the lowest unit charge are subject to compliance with the following conditions:

(a) To receive the lowest unit charge during the applicable 45-day/60-day political windows, a candidate for *federal* office must provide a written certification to the Station stating that his or her advertisements will not mention any opponent unless at the end of such advertisement there appears simultaneously, for a period no less than 4 seconds—(i) a clearly identifiable photographic or similar image of the candidate; and (ii) a clearly readable printed statement, identifying the candidate and stating that the candidate has approved the broadcast and that the candidate’s authorized committee paid for the broadcast. Such certifications shall be provided and certified as accurate by the candidate (or any authorized committee of the candidate) at the time of purchase.

(b) Where a federal candidate has supplied the above-referenced certificate, any ads submitted by that candidate must, in fact, comply with the certificate in order to receive the lowest unit charge. In the event that a federal candidate’s ad does not comply with the above-referenced certificate, that candidate will not be eligible for the lowest unit charge for any ads placed during any remaining lowest unit charge windows.

#### **SECTION 4**

#### **REASONABLE ACCESS BY FEDERAL CANDIDATES**

Federal law affords candidates for Federal office “reasonable access” to “use” a broadcast station’s facilities. We will afford “legally qualified” federal candidates, (i.e. candidates for President, Vice President, U.S. Senate and U.S. House of Representatives), “reasonable access” for the “use” of our facilities.

## **SECTION 5 ACCESS BY NON-FEDERAL CANDIDATES**

Candidates for state and local office will be afforded access to the station's facilities subject to the time demands of federal candidates and our overall advertising availabilities.

The station has found it necessary to limit the amount and class of advertising purchased by candidates for state and local offices. Availabilities are as follows (Bookend :15's are not allowed. Each 60-second spot will count as 2 spots, but 10-, 15-, and 30-second lengths will count as 1 spot):

NOTE: As noted above, the station has found it necessary to limit the amount and class of advertising purchased by candidates for state and local offices. If a show is not available for non-federal candidates, it will not be listed.

The Station may also find it necessary at times not to accept advertising by certain candidates for state and local offices.

## **SECTION 6 HOW OUR ADVERTISING IS SOLD**

Our advertising rates are negotiated and established on an individual basis with each advertiser, and the rates vary depending on the class of time and overall market conditions and advertiser demand at the time the order is placed. These demand-driven rates will be extended to all political candidates to whom we sell advertising.

We offer to all advertisers the following classes of time:

- 1) Fixed, Non-Preemptible
- 2) Non- Preemptible
- 3) Preemptible With 48 Hours Notice;
- 4) Immediately Preemptible
- 5) Immediately Preemptible -Weekly Run of Schedule
- 6) Immediately Preemptible -Monthly Run of Schedule

A description and definition of each class follows:

1. Fixed Announcements-Non-Preemptible. These announcements are broadcast at an agreed upon rate at a *specific time* within a specific program. They are the most expensive class of time sold by the Station. These announcements will not be preempted by an advertiser offering a higher rate. This class is also required to preempt Class 3 announcements.
2. Non-Preemptible. These announcements are broadcast at an agreed upon rate within a specific program. They are the second most expensive class of time sold by

the Station. An advertiser offering a higher rate will not preempt these announcements. This class is also required to preempt Class 4 announcements.

3. Preemptible With 48 Hours Notice. These announcements are subject to preemption only by a Class 1 announcement and upon prior notice to the advertiser. Preemptible with 48 Hour Notice announcements are superior in terms of preemption and make goods to Immediately Preemptible (Class 4) announcements, but subordinate to Non-Preemptible (Class 1 & 2) announcements. At current selling levels, we estimate that this class of time will be preempted approximately thirty percent (30%) of the time. The likelihood of preemption is a function of a number of factors including supply and demand. We will, upon request, provide you with a more current estimate of the likelihood of preemption when your order is placed.
4. Immediately Preemptible. These announcements are scheduled to be broadcast at a specific time but may be preempted at any time if another advertiser desires to buy the time at Class 1 or Class 2. These announcements carry the highest risk of preemption and, consequently, are the least expensive of all classes of time offered by the station. At current selling levels, we estimate that this class of announcements will be preempted approximately fifteen percent (25%) of the time. The likelihood of preemption is a function of a number of factors including supply and demand. We will, upon request, provide you with a more current estimate of the likelihood of preemption when your order is placed.
5. Immediately Preemptible-Weekly Run Of Schedule. These announcements are run during specified or broad time periods in a specific week. They are scheduled at the discretion of the Station and run only if no higher paying advertiser purchases the time period during which they are scheduled. At current selling levels, we estimate that these announcements are preempted approximately fifty percent (50%) of the time. The likelihood of preemption is a function of a number of factors including supply and demand. We will, upon request, provide you with a more current estimate of the likelihood of preemption when your order is placed.
6. Immediately Preemptible-Monthly Run Of Schedule. These announcements are run across all time periods at any available time during a specific month. They are scheduled at the discretion of the Station and run only if no higher paying advertiser purchases the time period during which they are scheduled. At current selling levels, we estimate that these announcements are preempted approximately fifty percent (50%) of the time. If pre-empted, these spots will be scheduled at other available times during the month without notice to the advertiser. The likelihood of preemption is a function of a number of factors including supply and demand. We will, upon request, provide you with a more current estimate of the likelihood of preemption when your order is placed.

WOLO Digital Sub channel Programming on 25.4. The station offers programming from ME TV, a nostalgia channel. We offer broad daypart placement only. The channel does currently meet the minimum reporting thresholds as defined by the Nielsen VIP reports. Lowest unit rates by week can be provided upon request.

## **SECTION 7 TIME UNITS AVAILABLE**

We will sell spot advertising time to candidates in 10, 15, 30, 60 and 120 second units.

Although we do not routinely sell time in units of more than 120 second durations, requests by political candidates to purchase longer form program times will be evaluated on a case by case basis. We request that you inquire of us if you are interested in purchasing longer form program time, and we will review with you the availabilities and rates that would be applicable both outside and within the "lowest unit charge" periods.

Federal candidates will be afforded "reasonable access" to all time units, and all candidates for the same office will be assured "equal opportunity" in the placement, purchase and amount of time.

## **SECTION 8 PREEMPTION PRIORITY FOR THE SAME CLASS OF TIME**

In the event our sales orders for the same class of announcements for the same period should exceed the stations available inventory, we will, subject to the "reasonable access" requirements for federal candidates, establish a scheduling priority for the announcements on the following basis:

1. Outside the "lowest unit charge" periods, priority will be given to the schedule of announcements purchased by the advertiser that has purchased, in the aggregate, the largest dollar volume of advertising. In the event two or more advertisers have purchased the same dollar volume, the advertiser whose order was purchased first will be afforded priority.
2. During the "lowest unit charge" periods, political advertisements qualifying for the "lowest unit charge" will be afforded scheduling parity with the advertisements purchased by the stations most favored commercial advertisers. In the event the purchase orders of a commercial and political advertiser should be considered equal under these criteria, a political advertiser will be afforded priority. In the event the purchase order of two or more political advertisers should be considered equal under these criteria, the candidate whose order was placed first will be afforded priority.

## **SECTION 9 MAKE GOOD POLICY**

In the event an Immediately Preemptible, Preemptible with Notice or a Run of Schedule announcement is preempted, we will attempt to provide a "make good" announcement in a comparable time period to achieve an audience level comparable to that which might have been estimated or projected by us when the order was placed. In these circumstances, if a suitable make good announcement cannot be broadcast; we will issue a rebate or credit as the advertiser elects.

## **SECTION 10**

### **POLITICAL BROADCAST RATES OUTSIDE PRE-ELECTION PERIODS**

The portion of the year outside the 45-day pre-preliminary and 60-day pre-general election lowest unit charge periods is referred to below as the "Comparable Rate Period." During the Comparable Rate Period, advertising sold to legally qualified candidates for public office by WOLO-TV will be at charges comparable to the charges made to other advertisers for comparable advertising.

1. Factors Affecting Rates: Most advertising on WOLO-TV is sold at negotiated rates. When an advertiser requests information concerning availabilities, our normal practice is to provide initial rate quotations such as those set forth on the attached sheet. Using these initial rate quotes as a point of departure, individual contracts with advertisers are negotiated at rates that may vary for any given program or daypart according to various factors. Such factors may include:
  - a) The class of the spots ordered. The different classes of advertising sold by WOLO-TV are listed on the attached sheet.
  - b) The total volume of advertising ordered by a particular advertiser.
  - c) The percentage of an advertiser's total advertising budget for our market that is allotted to our station.
  - d) The degree of flexibility our station is afforded in preempting spots in heavy demand periods or in moving spots to different days or times.
  - e) The extent to which spots are ordered to run in broad day parts or on any one of several days, as contrasted with spots ordered to run at fixed times on specific days or in narrowly defined day parts.
  - f) Our projected total demand for spots by all advertisers, and the WOLO-TV spot inventory we project for the times an advertiser seeks to have its spots broadcast.
  - g) Whether the acceptance of a particular order will require preemption of previously scheduled spots of other advertisers.

The factors listed above will affect the price of advertising sold to candidates in the Comparable Rate Period to the same extent as the factors affect the price of advertising sold to non-candidate advertisers. We will present rate quotations to candidate advertisers and negotiate time sales with candidate advertisers in the Comparable Rate Period in the same manner as we provide rate quotations to and negotiate with non-candidate advertisers.

The rates listed in our current Rate Sheet constitute the current charges extended to our regular commercial advertisers for the various classes of this time described above.

These are the rates that are available to political advertisers outside the lowest unit charge periods.

## 2. Make good:

Our policy with respect to make-goods for preempted spots is to use our best efforts to provide such make-goods at times acceptable to the advertiser involved. To the extent that inventory constraints prevent us from offering make-goods acceptable to the advertiser, the advertiser is not charged for any preempted spots.

Federal candidates must provide WOLO-TV with a certification acceptable to WOLO-TV that they (or their authorized committee) have not and will not make any direct reference to another candidate for the same office in any broadcast unless the broadcast complies with Section 315 (b) (2) (C) of the Communications act amended by the Bipartisan Campaign Reform Act. This certification must be provided before the pre-election windows if the candidate intends to receive the statutory lowest unit charge inside the pre-election window, and should be provided with the first order whenever possible.

## **SECTION 11 CURRENT LOWEST UNIT CHARGE RATE**

The rates listed in our Current Rate Sheet constitute, as of that date, the "lowest unit charge" rates for the various classes and units of time in the same time periods described above. These rates apply during the forty-five (45) day and sixty (60) day "lowest unit charge" periods prior to each election. Again, political advertisers should be aware that because our rates are negotiated with each advertiser and rise and fall based upon overall advertiser demand, these rates are subject to change. Moreover, it is not always possible to determine the "lowest unit charge" for any given week until all advertising for that week has been broadcast. Where appropriate, credit or rebates as the advertiser may elect, will be issued.

## **SECTION 12 CURRENT RATES AND SELLING LEVELS**

At the end of each week, we will update the rates quoted above and will, upon request, provide our current rates and selling levels (i.e. estimated likelihood of preemption) to each advertiser. We encourage you to inquire of us each week so that the most current information may be furnished to you.



### **SECTION 13 AUDIENCE DELIVERY**

While we will, upon request, attempt, in good faith, to estimate the audience rating for a specific advertising purchase, we do not guarantee that a particular advertising schedule will deliver that rating. We do not provide cash refunds or rebates to any commercial or political advertiser as the result of our failure to deliver an estimated audience rating. We will offer to run, at our discretion, bonus spots after an advertising schedule has been broadcast if our rating information indicates that WOLO-TV delivered less than ninety percent (90%) of our estimated rating. The provision of such bonus advertisements however is not guaranteed; bonus amounts in these circumstances are subject to other time demands and availability and may not be offered in the same time periods as the original schedule.

Political advertisers should note that audience-rating data might not be received until after an election. Therefore, a determination of appropriateness of bonus advertising may not be made until after the election. Accordingly, any bonus advertising announcements that might be offered may be of no value to political advertisers. Rebates in these circumstances will not be made to political candidates because, as noted above, we do not make rebates to commercial advertisers for under delivery of estimated audience ratings.

### **SECTION 14 PACKAGE PLANS**

From time to time, highly preemptible "Run of Schedule" (ROS), packages are developed on an "as requested" basis. These are available upon request.

### **SECTION 15 PER INQUIRY AND DIRECT RESPONSE RATES**

From time to time the station accepts per inquiry or per response advertising. WOLO-TV also accepts direct response advertising. Upon request, the station will provide a political candidate with additional information.

### **SECTION 16 NON-CASH MERCHANDISING AND PROMOTIONAL ADVERTISER INCENTIVES**

The station may offer various non-cash merchandising and promotion incentives to commercial advertisers. These are two instances where these incentives are not available to political advertisers: (1) where the value of such merchandise is de minimis

or (2) where the non-cash incentive plans or promotion reasonably imply a relationship between the station and the advertiser.

An incentive travel program is being offered by WOLO during the year 2016. Advertisers were offered participation in this program for increased spending with WOLO vs. 2015 spending levels. The required amount of 2016 increased spending vs 2015 is \$40,000 for new trip participants, and \$35,000 for returning trip participants from the 2015 program. To qualify, a spending level for 2016 with the station for each client must be agreed to in writing during the time which the incentive program is being offered. Once the allotted advertiser trips are sold out, no more will be available for use by any station advertiser. The travel dates are September 28- October 7, 2016. As of September 9, 2016 all participants must be ticketed for airfare to participate in the client trip. Travel dates are October 2016. The station Advertisers unable to participate in the program during the appointed time lose the privilege and no other consideration is offered. Additional information regarding this program is available upon request.

## **SECTION 17 AGENCY AND CANDIDATE COMMISSIONS**

The station customarily provides a fifteen percent (15%) discount for advertising purchases made by an advertising agency. Political candidates and authorized campaign committees who purchase time for "use" during the "lowest unit charge" period without an advertising agency will be extended a fifteen percent (15%) discount.

## **SECTION 18 POLITICAL ADVERTISING DURING NEWS PROGRAMS**

The station will sell political time to all candidates within some of its scheduled newscasts. However, it will not sell political time in or adjacent to any special program that is a "meet the candidate" type forum.

The station limits access to one (1) political advertisement, up to thirty (30) seconds in length, per newscast, per qualified candidate.

We accept political advertisements during local news programming. Political advertising is run only in commercial breaks #3 and #4 of local programming segments.

## **SECTION 19 PRODUCTION CHARGES**

Charges for the production of political advertising will not exceed comparable production charges made to commercial advertisers. If you are interested in having us produce a

political ad, we encourage you to let us know and we will provide you with rate information. In order to prevent the appearance that our station supports or favors any political candidate, we do not allow our on-air talent to appear in any political advertising.

## **SECTION 20 SEPARATION OF COMPETITIVE POLITICAL ADVERTISEMENTS**

The station's policy is to attempt, where possible, to separate competitive political advertisements. However, that may not always be possible, and the station does not promise or warrant that competitive announcements will be separated.

## **SECTION 21 SPONSORSHIP IDENTIFICATION**

All political advertisements must fulfill sponsorship identification requirements as established by the FCC. The identification must state that the broadcast is "sponsored, paid for or furnished by" the identified person on whose behalf the advertising is purchased. All television ads must contain a visual identification in letters equal to or greater than four (4%) percent of the vertical picture height (i.e. no less than 20 scan lines) for a period of not less than four (4) seconds. Should a candidate's ad not be submitted in sufficient time for a pre-airing review or not contain the proper identification, the Station will add the required material within the announcement. This may result in the content of the advertisement being truncated.

Station expects all Federal candidates to comply with the sponsorship identification requirements at the Bipartisan Campaign Reform Act of 2002. It is the responsibility of the candidate, and not the Station, to insure that each candidate ad complies with the applicable Federal requirements. For a Federal candidate to receive the lowest unit charge, all advertisements that refer to an opposing candidate must contain a printed statement that is displayed with a candidate picture. The printed statement must identify the candidate, state that the candidate approved the broadcast, and state that the candidate and/or the candidate's authorized committee paid for the broadcast.

## **SECTION 22 ORDERING DEADLINES**

The station deadline for ordering is as follows:

DEADLINE DAY

PROGRAMMING DAY(S)

Monday @ 10am  
Tuesday @ 10am  
Wednesday @ 10am  
Thursday @ 10am  
Friday @ 10am  
Friday @ 12pm

Tuesday Programming  
Wednesday Programming  
Thursday Programming  
Friday Programming  
Saturday & Sunday Programming  
Monday Programming

The failure of a political advertiser to fulfill all requirements in advance of the deadlines may result in preemption of some or all announcements or programs previously scheduled.

The stations regular-ordering deadlines may be waived where appropriate, to provide "equal opportunity" to political candidates or to provide federal candidates with reasonable access.

### **SECTION 23 BROADCAST OF POLITICAL ADS ON ELECTION DAY**

It is our policy not to broadcast political advertisements after 7:00 pm on the day of an election. This policy may be waived, however, where appropriate to provide "equal opportunity" to political candidates or to provide federal candidates with reasonable access.

### **SECTION 24 WHO TO CONTACT**

Political advertisers interested in ordering time should contact:

Political advertisers interested in ordering time should contact:

Vice President/General Manager.....Chris Bailey  
Shipping Address.....5807 Shakespeare Rd., Columbia, SC 29223  
Telephone Number.....803-754-7525  
Fax Number.....803-735-8644  
Email Address.....cbailey@abccolumbia.com

## **SECTION 25 COMMERCIAL MATERIALS SPECIFICATIONS**

Physical tapes of commercials are rarely used and candidates are requested to facilitate delivery via .ftp online sites.

Changes to commercial instructions should be made in writing to the station by letter, email, or fax prior to the changes being made. Commercial materials should be received in sufficient time to permit confirmation of compliance with sponsorship identification requirements and with broadcast technical standards.

Commercials and instructions should be submitted to the station as soon as possible to ensure proper airing. File requirements for sending commercials via FTP are as follows:

One spot per file, content name and traffic instructions must match, 2 channel mixed audio, file must have 5 seconds of video prior to commercial & 1 second of black at the end, 3 seconds slate (include Client, Title, ISIC code, length & date), 2 seconds of black, your commercial, and 1 second of black after your commercial.

Your commercial must be uploaded by 10am the day before air date.

### **HD SPECIFICATIONS:**

Acceptable File Formats: .MOV, .MXF  
MOV A PNG Compression works well for HD  
.MXF Sony XD CAM EX 720P60 VBR  
Make sure graphics are 4x3 safe 1280x720p

### **SD SPECIFICATIONS:**

Acceptable File Formats: .MOV, .MPGS, .AVI  
720X480 29.97 frame rate  
QuickTime is the preferred format  
DV/NTSC compression works well for SD

## **SECTION 26 TAPE AND COPY DELIVERY**

Tapes and copy should be delivered to:

Traffic Manager.....Lou Mauney (Charlotte)/Gwen White Columbia  
Street Address..... 1 Television Place, Charlotte ,NC 28205-7098  
Telephone Number.....704-372-1800

## **SECTION 27 PAYMENT AND CREDIT POLICY**

Orders for political time will not be considered firm, and accordingly will not be scheduled until all of the following have been received or satisfied:

1. Completed and signed agreement for political candidates.
2. Net cash payment for orders must be received 24 hours prior to broadcast of the first announcement scheduled in any contract. Announcements for independent political action committees or issue advertising must be paid in advance at the time that the order is placed. However, on emergency basis only, we will accept payment up to the date scheduled for the broadcast of the announcement, during regular business hours of 8:00am to 5:00pm, M-F.
3. Where the purchase is made by a corporation, association, or other unincorporated group, a list of the entity's Chief Executive Officer, a list of members of the Executive Committee or Board of Directors will be necessary.
4. Where doubt exists, satisfactory proof that the candidate is legally qualified, as that term is defined by the FCC.
5. Where doubt exists, satisfactory proof that the purchaser is authorized to buy time for the candidate and the time or programming is approved, controlled or sponsored by the candidate or the candidate's authorized campaign committee.
6. Advance orders for the schedules of political advertising will be subject to reconfirmation thirty (30) days preceding the start of the schedule.

## **SECTION 28 STATION'S RIGHT TO RECAPTURE TIME**

We reserve the right to cancel or adjust the amount of time sold on the station to accommodate special programming or advertising preemption's, or because of technical difficulties or labor disputes, or for other reasons beyond the control of the station, or where necessary to enable the station, pursuant to the Communications Act of 1934, to satisfy the "equal opportunity" requirements of all legally qualified political candidates and the "reasonable access" requirements of all legally qualified federal political candidates. Where such cancellations or modifications are necessary, advertisers will be advised and rebates credits, schedule changes or other adjustments will be made as may be appropriate.

## **SECTION 29 DISCLOSURE STATEMENT IS NOT AN OFFER TO SELL**

This Disclosure Statement does not constitute an offer to sell time, nor is it a contract; rather it is a statement of the policies which this station, in good faith, attempts to

follow in connections with the sale and placement of political broadcast advertising. The terms of any actual sale of time are contained in our sale contracts and none of the matters contained in this Disclosure Statement are incorporated by reference in the sale contract.

### **SECTION 30 FURTHER INFORMATION**

We will be pleased to provide, upon request, further information about our rates, advertising policies, advertising packages and advertising plans. We encourage prospective political advertisers to inquire. It is our desire to furnish all appropriate information to those interested in purchasing political advertising on the station to assist you in communicating your message within our service area.